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M.L. HATCHER, CLK  
U.S. BANKRUPTCY COURT  
W.D. OF WA AT SEATTLE  
BY \_\_\_\_\_ BFP CLK.

Honorable Marc L. Barreca  
Submitted for a hearing on July 20, 2012  
Absent any motion scheduled to approve  
"Proposed Order On Claims"

THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In Re

ADAM R. GROSSMAN

NO. 10-19817

ADAM R. GROSSMAN'S  
OBJECTION TO PROPOSED  
ORDER ON CLAIMS (#1)

ADAM R. GROSSMAN'S OBJECTION  
TO PROPOSED ORDER ON CLAIMS (#1)  
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S/ADAM R. GROSSMAN/  
5766 27<sup>TH</sup> AVE NE  
SEATTLE, WA 98105  
646-342-1994  
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1 This claim should be denied.

2 **No Caption -- Analogous Wording To Docket #369**

3 There is no caption on the upper right part of the first page because there was no hearing or  
4 motion to approve claims. Rather, the trustee's attorney submitted suggested "Order Allowing  
5 Claims" in Docket #368 absent any motion to approve claims for which a purported "Order  
6 Allowing Claims" would have been relevant.

7  
8 Similar to docket entry #369 "Tsai Law Company's Objection To Proposed Order On Claims"  
9 (See Exhibit "1") which objects to a proposed order absent any motion to approve the order, I  
10 have similarly submitted this document, "Objection to Proposed Order On Claims."

11 **Counsel Should Know Better**

12 First, the claim was submitted not pro se but with the assistance of counsel who erroneously  
13 included judgments, often void, of which already half have been discarded as improper by the  
14 trustee due to the attempted inclusion of amounts after the date of conversion.

15 **Duplicated Claim**

16  
17 Second, it includes the same \$6,000 entry on the claimant's employer's claim (see related  
18 objection) which was,

- 19 1. resulting from a void judgment, that,  
20 2. was caused by a void decree, which,  
21 3. was requested by claimant requiring an error of law,  
22 4. was obtained by claimant during an action in which her sworn testimony was used in  
23 support of a motion the prior court day that, "financial issues... could not be decided" and  
24 "financial matters were off the table"; and,  
25  
26  
27

5. remains subject to discretionary appeal by the Washington State Supreme Court;
6. is in fact preferential payment of unsecured third party debt and not DSO;
7. includes the charging of interest or late fees during a pending bankruptcy;
8. is duplicated in its entirety by the amount in Claim #10;
9. the entire \$6,000 amount was already paid in full (see Claim #10);
10. the majority of judgments included are void resulting from enforcement void debt;
11. created by a court lacking jurisdictional; and
12. deriving from a decree which is void;
13. for debt that is unenforceable to collect under state law; and,
14. where generally the collection of debt unenforceable under state law is illegal.

#### **Fraudulent Claim**

Third, the claimant continues to perpetrate fraudulent accounting potentially representing a 10(b)-5 securities fraud violation that is being reported to law enforcement and was caused by the claimant and at least one other person agreeing in advance agreed in advance to engage in or causing the performance of such conduct that included making false statements known to be false by the speaker(s) at the time they were made and omitting facts or suppressing information which, in light of the circumstances under which they were made, would be necessary to make the statements not misleading, or to employ a scheme or artifice or to engage in any act, practice, or course of conduct for the purpose, intent, and goal of knowingly and willfully misrepresenting to people, or failing to inform them, of material facts upon which they relied, directly or indirectly, in connection with the purchase of sale of securities offered by the Tanager Fund LP, regulated by the SEC and filed under Regulation D §504 and §505 exempt

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1 from registration but subject to the full force and powers pursuant to The Act, as amended, with  
2 restrictions set forth therein including the use of any means or instrumentality of interstate  
3 commerce, or of the U.S. Mail, or of electronic wires across state lines, for the ultimate goal of  
4 deceiving other people, defrauding investors, and taking the property belonging to one or more  
5 people. The claimant directly and through her attorney have encouraged the trustee to adopt this  
6 fraudulent accounting which defrauds investors in the Tanager Fund LP and, ultimately, is  
7 likely to incur substantial liability to the estate.  
8

9 **Set-Off Exceeds Claim**

10 Fourth, the claimant has failed to turnover property belonging to the estate located at 6821  
11 39th Ave, Seattle, WA, 98115. While potentially having negative value, one valuation method  
12 valued it at par. The current balances of mortgages appear to be represented to the estate as  
13 \$50,000 greater than they currently should be. The value of the property represented to the  
14 estate appears to be the same value used in 2010 which is seems to be nearly \$200,000 less than  
15 its current value thus defrauding the estate of any appreciation which occurred while the  
16 property was in the estate and is owed to the estate for the benefit of the creditors. This set-off  
17 negates even all of the claims alleged and not objected to already by the trustee or otherwise  
18 herein.  
19

20 **Intentional Wasting of Estate Assets**

21 Fifth, if any unsecured creditor wants to know why \$400,000 is being paid out of the estate  
22 while not a single \$1 is currently planned to be paid to any single unsecured creditor, ask this  
23 claimant who has conspired to commit securities fraud combined with the knowledge that came  
24  
25  
26  
27

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1 with being both a limited partner and an insider of an asset management partnership operated  
2 by her husband closing operations and having clients around the country making cash payments  
3 to various locations around the country during the closing of the business to return client funds  
4 to clients upon request while claiming that such payments returning client funds to clients  
5 should be investigated because she could not think of any reason that would cause distribution  
6 of cash payment to clients. A requested investigation was requested to "recover the funds" that  
7 were claimed to be kept out of the claimant's "reach" and where the return of clients' money  
8 was described as having "no apparent benefit" to her or the estate but could instead be used to  
9 pay expenses requested by the claimant. If the purpose then was not to keep the funds out of the  
10 claimant's reach, by now the purpose has changed for this to now be the primary reason. The  
11 requested investigation costing \$400,000 has the ultimate result that no unsecured creditor, nor  
12 any of over eight secured creditors, will be paid even a single \$1. Any questions by any creditor  
13 about why these events were supported and requested should be directed to this claimant.  
14  
15

16  
17 Dated August 31, 2012, signed in Seattle, WA.

18 s/Adam R. Grossman/  
19

20 Resubmitted and resigned

21 Dated September 10, 2012, signed in Seattle, WA.

22 s/Adam R. Grossman/  
23  
24  
25  
26  
27

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1 Exhibit "1"

2  
3 UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF WASHINGTON, AT SEATTLE

4 In re

NO. 10-19817

5  
6 ADAM GROSSMAN

7 Debtor,

TSAI LAW COMPANY'S  
OBJECTION TO PROPOSED  
ORDER ON CLAIMS

8  
9 Special Counsel for Debtor Tsai Law Company PLLC, objects to the proposed Order  
10 Allowing Claims insofar as Tsai Law Company's Chapter 11 administrative claim amount is  
11 shown by the Trustee as \$30,000 on page 9 of the proposed Order, when in actuality, the Court  
12 has approved Tsai Law Company's compensation request in the Chapter 11 proceeding in  
13 amount of \$62,079 (Docket No. 196 attached). Tsai Law Company requests that the Order  
14 Allowing Claims accurately reflect the approved amount.

15 Dated this 13th of July, 2012

16  
17 s/John H. O'Rourke WSBA 21615  
WSBA 21615 Attorney for Tsai Law Company

18  
19  
20  
21 LAW OFFICE OF JOHN H. O'ROURKE  
22 2101 FOURTH AVENUE, SUITE 1566  
23 SEATTLE, WA 98121  
24 (206) 824-2802

25 Case 10-19817-MLB Doc 369 Filed 07/13/12 Ent 07/13/12 16:09:51 Pg 1 of 4

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